

FISHER & PHILLIPS LLP
 3993 Howard Hughes Parkway, Suite 650
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EILEEN LANAHAN,)	Case No.: 2:06-cv-1176-LRH-RJJ
)	
Plaintiff,)	
)	
vs.)	<u>STIPULATION AND REQUEST</u>
)	<u>FOR EXTENSION FOR</u>
)	<u>DEFENDANT TO FILE REPLY TO</u>
SOUTHERN NEVADA HEALTH)	<u>PLAINTIFF'S OPPOSITION TO</u>
DISTRICT, fka Clark County Health)	<u>MOTION FOR SUMMARY</u>
District,)	<u>JUDGMENT AND ORDER</u>
)	<u>THEREON (FIRST REQUEST)</u>
Defendant.)	
)	

IT IS HEREBY STIPULATED by the parties, by and through their respective counsel of record, that Defendant, SOUTHERN NEVADA HEALTH DISTRICT, be granted an extension of eight days, up to and including, September 10, 2008, within which to file its Reply to Plaintiff's Opposition to Defendant's Motion for Summary Judgment ("Plaintiff's Opposition"). Defendant's Motion for Summary Judgment was filed on July 9, 2008. Accordingly, Plaintiff's Opposition was originally due on July 28, 2008. On August 4, 2008, the above-referenced Court granted Plaintiff its first extension of time within which to file her Opposition. Again, on August 13, 2008, the honorable Court granted a second extension of time to Plaintiff to file her Opposition. Under said Order, Defendant's Reply to Plaintiff's Opposition was due on or before September 2, 2008.

1 Defendant makes its first request for an extension of time within which to file its
2 Reply to Plaintiff's Opposition because Plaintiff's multiple requests for extensions has
3 pushed the Reply deadline to a time when Defendant's counsel, Shaun P. Haley, has
4 been involved in extensive collective bargaining negotiations, arbitration hearings, and
5 other events on behalf of other clients and, therefore, he has been unable to complete
6 the Reply to Plaintiff's Opposition.

7 This is Defendant's first request for an extension in this matter and is made in
8 good faith and not for any reason of delay.

9 Therefore, it is request that the Court grant Defendant up to and including
10 September 10, 2008, within which to file its Reply to Plaintiff's Opposition.

11 DATED this 2nd day of September, 2008 DATED this 2nd day of September, 2008.

12 FISHER & PHILLIPS LLP

13 /s/ Richard Segerblom
14 RICHARD SEGERBLOM, ESQ.
15 Nevada Bar No.: 1010
16 704 South Ninth Street
17 Las Vegas, NV 89101
18 Attorney for Plaintiff

By /s/ Shaun P. Haley
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Attorneys for Defendant

19 IT IS SO ORDERED

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23 LARRY R. HICKS
24 UNITED STATES DISTRICT JUDGE

25 DATED: September 3, 2008
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